

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

<b>IN RE:</b>  <b>FIELDWOOD ENERGY LLC, et al.</b>  <b>Debtors.<sup>1</sup></b>	§ <b>Chapter 11</b> § § <b>Case No. 20-33948 (MI)</b> § § <b>(Jointly Administered)</b> § § <u>Hearing Date:</u> June 18, 2021 § <u>Hearing Time:</u> 9:30 AM (CT) § <u>Hearing Location:</u> Electronic (Audio & Video) § <u>Judge Presiding:</u> Marvin Isgur
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**HCC INTERNATIONAL INSURANCE COMPANY PLC’S  
COMBINED WITNESS AND EXHIBIT LIST**

HCC International Insurance Company Plc (the “*HCCI*”) submits the following combined Witness and Exhibit List for the Confirmation Hearing scheduled on June 18, 2021, at 9:30 AM (CT), before the Honorable Marvin Isgur, United States Bankruptcy Judge. The hearing will be held electronically.

**WITNESS LIST**

1. Lily W. Cheung, P.E., Vice President and Team Leader, Netherland, Sewell & Associates, Inc.
2. Michael Dane, CFO – Fieldwood Energy, LLC
3. Jon Graham, Sole Manager - FWE I
4. Martin Ward or another representative of HCCI
5. Any witness designated or called by any party; and

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<sup>1</sup> The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, as applicable, are: Fieldwood Energy LLC (6778), Fieldwood Energy Inc. (4991), Fieldwood Onshore LLC (3489), Fieldwood SD Offshore LLC (8786), Fieldwood Energy Offshore LLC (4494), Fieldwood Offshore LLC (2930), GOM Shelf LLC (8107), FW GOM Pipeline, Inc. (8440), Galveston Bay Procession LLC (5703), Galveston Bay Procession LLC (0422), Fieldwood Energy SP LLC (1971), Dynamic Offshore Resources NS, LLC (0158), Bandon Oil and Gas, LP (9266), and Bandon Oil and Gas GP, LLC (9172). The Debtors’ primary mailing address is 2000 W. Sam Houston Parkway S., Suite 1200, Houston, TX 77042.

6. Any witness required for rebuttal.

**EXHIBIT LIST**

<b>Exhibit No.</b>	<b>Description</b>	<b>Offered</b>	<b>Objection</b>	<b>Admitted</b>	<b>Disposition After Hearing</b>
<b>1</b>	Doc. No. 723 – Disclosure Statement for Joint Chapter 11 Plan of Fieldwood Energy LLC and its Affiliated Debtors				
<b>2</b>	Doc. No. 1285 – Revised Disclosure Statement				
<b>3</b>	FWE-0000017, YE2020 ARIES File with FWEI Breakout HIGHLY CONFIDENTIAL				
<b>4</b>	FWE-0000008, FWEI One-lines HIGHLY CONFIDENTIAL				
<b>5</b>	FWE-0000016, FWEI Company Plan HIGHLY CONFIDENTIAL				
<b>6</b>	FWE-0038675, Updated FWEI Company Plan Model HIGHLY CONFIDENTIAL				
<b>7</b>	FWE-0045265, Fields not returning to production, Plans for currently shut-in fields HIGHLY CONFIDENTIAL				
<b>8</b>	FWE-0045403 Total Abandonment with FWEI Break out HIGHLY CONFIDENTIAL				
<b>9</b>	Doc. No. 1285-2 – Exhibit O to Disclosure Statement, Financial Projections				
<b>10</b>	Relativity Pull 2_26_2021.xls — lease list, type, operator, acre, status HIGHLY CONFIDENTIAL PROFESSIONAL EYES ONLY				
<b>11</b>	NTL No. 2018-G03 — U.S. Department of the Interior Bureau of Safety and Environmental Enforcement Gulf of Mexico OCS Region — Notice to Lessees and Operators of Federal Oil and Gas Leases and Pipeline Right-of-Way Holders in the Outer Continental Shelf, Gulf of Mexico OCS Region				

<b>12</b>	FWE I Lease List.xls HIGHLY CONFIDENTIAL PROFESSIONAL EYES ONLY				
<b>13</b>	FWE-0035293 — Lease Operating Statements HIGHLY CONFIDENTIAL				
<b>14</b>	FWE-0000006 — Damage Report CONFIDENTIAL				
<b>15</b>	FWE-0035294 – Lease Suspension of Production and related documents CONFIDENTIAL				
<b>16</b>	FWE-0035378 — Incident of Noncompliance record HIGHLY CONFIDENTIAL PROFESSIONAL EYES ONLY				
<b>17</b>	FWE-Surety-00008842 — Accounting statement of Trust A CONFIDENTIAL				
<b>18</b>	FWE-Surety-00008840 — Decommissioning Trusts Overview HIGHLY CONFIDENTIAL				
<b>19</b>	FWE-Surety-00008858 — MY2020 Reserves One-lines HIGHLY CONFIDENTIAL PROFESSIONAL EYES ONLY				
<b>20</b>	FWE Disclosure Statement OG Lease Exhibits DRAFT 03.06.21_1545 HIGHLY CONFIDENTIAL PROFESSIONAL EYES ONLY				
<b>21</b>	Houlihan Lokey Valuation Expert Report HIGHLY CONFIDENTIAL				
<b>22</b>	Oral Deposition of Debtor Fieldwood Energy, LLC's 30(b)(6) Representative, Michael T. Dane — May 13, 2021				
<b>23</b>	Oral Deposition of Jon Graham – June 2, 2021				
<b>24</b>	Deposition Cupit Brett (Apache) 06.03.21				
<b>25</b>	Debtors' Responses and Objections to Joint Surety Interrogatories and Request for Production of Documents from the Debtors				

<b>26</b>	FWE-0000008 - FWEI Onelines_YE2020_LWC Comments HIGHLY CONFIDENTIAL PROFESSIONAL EYES ONLY				
<b>27</b>	FWE-0045403 Total Abandonment with Field Status HIGHLY CONFIDENTIAL PROFESSIONAL EYES ONLY				
<b>28</b>	FWEI Summaries 1P Revised HIGHLY CONFIDENTIAL PROFESSIONAL EYES ONLY				
<b>29</b>	HCCI - PoC - Fieldwood Energy				
<b>30</b>	HCCI - PoC Fieldwood Energy Offshore				
<b>31</b>	HCCI - PoC - Fieldwood SD Offshore				
<b>32</b>	HCCI - PoC - GOM Shelf LLC				
<b>33</b>	HCCI - General Indemnity Agreement				
<b>34</b>	HCCI - Letter of Credit				
<b>35</b>	HCCI - Participation Agreement				
<b>36</b>	HCCI - Surety Claims Sharing Agreement				
<b>37</b>	HCCI - Reimbursement Agreement				
<b>38</b>	HCCI - Collateral Demand Letter				
<b>39</b>	Everest Bond				
<b>40</b>	FWE-0049079_HIGHLY CONFIDENTIAL PROFESSIONAL EYES ONLY				
<b>41</b>	FWE-0049108_HIGHLY CONFIDENTIAL PROFESSIONAL EYES ONLY				
<b>42</b>	FWE-0049109_HIGHLY CONFIDENTIAL PROFESSIONAL EYES ONLY				
<b>43</b>	April 12 2016 Agreement				
<b>44</b>	OWL 7 – Offshore well and lease database, primary sources of information are from the Bureau of Ocean Energy Management (BOEM) and Bureau of Safety and Environmental Enforcement (BSEE)				

	Any pleadings or exhibits previously filed on the Court's docket.				
	Any demonstrative exhibits necessary for the Hearing.				
	Any exhibit identified or offered by any other party.				
	Any exhibit necessary for impeachment and/or rebuttal purposes.				

HCCI reserves the right to modify, amend, or supplement this Witness and Exhibit List at its discretion at any time prior to hearing in this matter.

HCCI Exhibits 3, 4, 5, 6, 7, 8, 10, 12, 13, 14, 15, 16, 17, 18, 19, 20, 21, 26, 27, 28, 40, 41, and 42 are marked "Confidential" or "Highly Confidential" pursuant to the Amended Stipulated Protective Order (Doc. No. 989) (the "Protective Order") and have been filed under seal.

Because of issues with file size or file formatting, the following exhibits could not be filed on the ECF electronic filing system and instead have been provided to the Court via physical media (on a thumb drive): HCCI Exhibits 4, 5, 6, 8, 10, 12, 13, 16, 18, 19, 20, 26, 27, 28, and 41. Parties to the Protective Order may request copies of these documents from the undersigned.

*[THE REMINDER OF THIS PAGE IS INTENTIONALLY LEFT BLANK]*

Respectfully submitted,

/s/ Simon R. Mayer

Philip G. Eisenberg  
Texas Bar Number 24033923  
Elizabeth M. Guffy  
Texas Bar Number 8592525  
Simon R. Mayer  
Texas Bar Number 24060243  
**LOCKE LORD LLP**  
600 Travis Street, Suite 2800  
Houston, Texas 77002  
Telephone: (713) 226-1200  
Facsimile: (713) 223-3717  
Email: [peisenberg@lockelord.com](mailto:peisenberg@lockelord.com)  
[eguffy@lockelord.com](mailto:eguffy@lockelord.com)  
[simon.mayer@lockelord.com](mailto:simon.mayer@lockelord.com)

Bradley C. Knapp  
Texas Bar Number 24060101  
**LOCKE LORD LLP**  
601 Poydras St., Suite 2660  
New Orleans, LA 70130  
Telephone: (504) 558-5210  
Email: [bknapp@lockelord.com](mailto:bknapp@lockelord.com)

***Attorneys for HCC International  
Insurance Company Plc***

**CERTIFICATE OF SERVICE**

I certify that, on June 16, 2021, a true and correct copy of the foregoing Witness and Exhibit List and the associated exhibits was served on all parties who receive service in the above-captioned bankruptcy proceeding via the Electronic Case Filing System for the United States Bankruptcy Court for the Southern District of Texas.

/s/ Simon R. Mayer

Simon R. Mayer